



BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

joelle.phillips@bellsouth.com

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OFFICE OF THE
EXECUTIVE SECRETARY
March 1, 2002

Joelle J. Phillips
Attorney

615 214 6311
Fax 615 214 7406

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Petition of MCI WorldCom to Enforce Interconnection Agreement with
BellSouth Telecommunications, Inc.*
Docket No. 01-00513

Dear Mr. Waddell:

BellSouth is in receipt of a letter dated February 25, 2002 from Henry Walker on behalf of MCI relating to this matter. In that letter, counsel for MCI makes various arguments based upon BellSouth's request for clarification of the data requests propounded and later withdrawn by the TRA Staff. BellSouth respectfully disagrees with MCI.

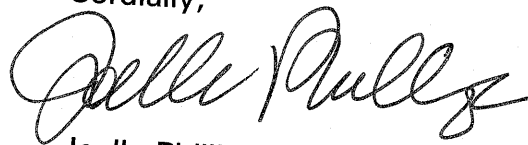
As discussed in the testimony presented in this docket, BellSouth's position in this case is that the contract requires the parties to use a PLU factor, rather than raw data, to calculate the reciprocal compensation due. Accordingly, BellSouth's concerns with respect to gathering and sorting the raw data in response to the data request is completely consistent with BellSouth's position in this docket. MCI's attempt to suggest otherwise is merely an attempt to distract the TRA away from the evidence presented in the hearing. MCI's assertion that BellSouth has "no billing records" to support its contentions in this case is inaccurate and inconsistent with the testimony presented in this case. BellSouth does, in fact, have billing records as described in its letter requesting clarification regarding the data requests. Due to the volume of those records, BellSouth uses summary records. Given that the contract at issue requires the use of a surrogate (the PLU) rather than the actual data, BellSouth's use of summary data rather than the raw AMA

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data is perfectly reasonable and consistent with the testimony in this docket. BellSouth respectfully disagrees with MCI's suggestion to the contrary.

BellSouth remains willing to provide the information discussed in its letter of February 19, 2002 if the TRA Staff decides to pursue this information.

Cordially,

A handwritten signature in cursive script, appearing to read "Joelle Phillips".

Joelle Phillips

JP/jej

cc: Henry Walker, Esquire